

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEBORAH SAVAGE,	)	
	)	
Plaintiff,	)	Case No. 08 C 0926
	)	
vs.	)	Judge Wayne R. Andersen
	)	
HEXION SPECIALTY CHEMICALS,	)	Magistrate Judge Susan E. Cox
INC.,	)	
	)	
Defendant.	)	

**UNCONTESTED MOTION FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

Defendant Hexion Specialty Chemicals, Inc. ( “Hexion”), through its counsel, pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 26.2, hereby respectfully moves the Court for entry of the Stipulated Protective Order (“Order”) attached hereto as an exhibit.<sup>1</sup> Entry of the Order is necessary to protect the privacy of individuals not parties to this suit and to protect the policies and procedures of Hexion from disclosure that would create hardship to Hexion or unfair advantage to Hexion’s competitors, suppliers, or customers.

Dated: April 14, 2008

/s/ Kara L. McCall  
Kara L. McCall  
Sarah M. Konsky

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<sup>1</sup> Pursuant to this Court’s Case Management Procedures, the proposed Stipulated Protective Order is also being sent via email to [Proposed\\_Order\\_Andersen@ilnd.uscourts.gov](mailto:Proposed_Order_Andersen@ilnd.uscourts.gov), with a copy to all counsel of record.

SIDLEY AUSTIN LLP  
One South Dearborn Street  
Chicago, IL 60603

Counsel for Defendant Hexion  
Specialty Chemicals, Inc.

**CERTIFICATE OF SERVICE**

I, Kara L. McCall, hereby certify that on April 14, 2008, a copy of the foregoing Motion for Entry of Stipulated Protective Order was electronically filed. Parties may access this filing through the Court's system. I also caused one copy to be sent via U.S. Mail to the following address, as counsel of record for Plaintiff:

Lisa Kane  
LISA KANE & ASSOCIATES, P.C.  
120 South LaSalle Street  
Suite 1420  
Chicago, Illinois 60603

/s/ Kara L. McCall  
Kara L. McCall